David Snyder - Revised concerns

From: Stephen Biggs <aardvarkwaste@mac.com>
To: David Snyder <dsnyder@utah.gov>
Date: 9/14/2012 9:53 PM
Subject: Revised concerns
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Sorry for venting about large tanks. I was reminded by another stakeholder that tanks that big aren't covered by R317-4 so I'm withdrawing those concerns. But I found the time to write down a couple more. Below is a revised copy of my "main" concerns. I look forward to the discussions.

Concerns

#1, My main concern is that pumpers aren't required to be certified. When the toilet stops flushing homeowners don't call the health dept. or a certified designer, they call a plumber or a pumper. If they call a plumber, the plumber calls the pumper. Then between the two of them the tank gets pumped and a new trench gets dug and the homeowner, plumber, and pumper are happy. Then we get together as an association (UOWA) or as stakeholders or CowPee and waste time talking about how to better protect ground and surface water from failing septic systems, but don't require the people who deal with failing systems on a day to day basis to even know about the dangers a failing or improperly designed system has to our water resources. All this rule R317-4 does is attempt to see that all "new"systems are designed properly. But new systems aren't new forever, and most likely 10- 15 maybe 20 years down the road, that once perfectly designed system is going to backup and the plumber and pumper will come work their magic. The health dept and DWQ will no nothing about it.

What use is it for a designer, installer, the health dept, or the DWQ to know what proper maintenance is for a conventional septic system if they never see a system in need of maintenance?

I want to clarify what I mean by "pumper". There are a lot of pumpers that don't pump septic tanks. Only pumpers who pump septic tanks should be required to get some sort of certification to show at least a basic understanding of R317-4 This certification could easily be verified by the local health dept at time of inspection on the truck for the issuance of a permit to operate and the permit could reflect whether or not the pumper is permitted to pump septics or not.

#2, Point of Sell inspection. Why do I think Point of Sell inspections are so useful? It's an opportunity to see and gather data on a system after its been in use. It's an opportunity for needed repairs to be made with the approval and awareness of the DWQ and or health dept. It's an opportunity to bring awareness to and educate the new owner on proper care and maintenance, and it helps prevent someone from passing on a failed system to an unsuspecting buyer. Point of Sell inspections are the most feasible way I know of for the State to have any oversight or insight of at least "some"existing conventional systems. The Feds (Fanny and Freddy) are already requiring septic inspection at point of sell on all their homes and many other lending institutions are becoming wise to the wisdom of point of sell septic inspection. While their reasons for the inspections are different from ours they have the same results of gathering data, catching struggling or failing systems, better protecting our environment and raising awareness to the home owner.

What use is it for a designer, installer, the health dept, or the DWQ to know what proper maintenance is for a conventional septic system if they never see a system in need of maintenance?

#3, Appendix E part C says, "The tank should be completely emptied if either the bottom of the floating scum mat is within 3 inches of the bottom of the outlet device (baffle or tee) or the sludge level has built up to approximately 12 inches from the bottom of the outlet device (baffle or tee)".
I would love to watch somebody determine how far away the bottom of the scum is from the bottom of the Tee. To do so would require way too much interaction with "stuff" and it doesn't yield any better info than estimating the thickness with a shovel. Sludge judges don't work for checking the scum, and other "core sampling" type instruments then have to be cleaned in a safe and responsible way, which isn't that easy. You need running water and running water splashes all over and stirs the scum layer. I think it would be better, easier, and safer, to simply require a minimum and maximum length of "drop pipe" on the bottom of the Tee like 12" to 16" for example. Then suggest the tank be emptied when the thickness of the scum or sludge reaches a

maximum thickness. I tell my customers with 1000 to 1500 gallon tanks, that the maximum thickness of the scum should be 8" and the sludge is 16". In my experience the sludge is usually double the thickness of the scum.

From a pumpers perspective, protecting the drain field isn't the only reason to limit the thickness of the scum. Being able to remove the scum from the tank should also be taken into consideration. I have seen many, many scum layers 12" thick that I could stand on. In fact, I dont refer to this floating layer as "Scum", I refer to it as "Crust". It literally has to be chopped and cut and smashed into pumpable pieces. This work can't be done through risers, and is extremely difficult even standing on top of the tank with both lids open. As a result most pumpers suck the water out from under the crust, which then sits on the bottom out of reach and never floats again, and is left in the tank along with the sludge underneath it. Risers limit the access of tools like shovels and other implements of crust destruction

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#4, Appendix E part C also says "The the septic tank should not be washed out". I'm wondering what evidence there is to suggest that using water to wash the sludge out of a septic tank is harmful or detrimental to the future performance of that system. Using water is the only practical way of getting all the sludge and solids out of the tank. If a clean septic tank is a threat to the future performance of a system and therefore a threat to our environment, then all new, unused systems are a threat and should be "seeded" with sludge from the neighbor or a dead chicken.

It is my opinion that because of the way rule R317-4 is implemented, managed and enforced, it will have little or no measurable success of better protecting our water/environment. Even properly designed/installed conventional systems will someday be old failing systems without proper maintenance. If it's older failing conventional systems that pose the threat, how can we expect results if the Rule, and governing bodies only have the capacity to oversee Design and installation?

Steve Biggs
Aardvark Waste Services

On Sep 5, 2012, at 11:30 AM, David Snyder <dsnyder@utah.gov> wrote:

> Stakeholders Group-
> I heard from over 10 members of this Stakeholders group and the majority accepted the following date to have the next meeting:
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> **October 1, 2012 1:30pm DEQ 3rd Floor- Red Rocks Room # 3132**

For those who wish to call in, we'll be sending out the number along with the agenda. If you can't make it, perhaps have a person in your discipline take your spot for the meeting, and bring your concerns with them.